

UPSTATE SHREDDING LLC

NYS LARGEST PRIVATELY OWNED SCRAP PROCESSOR

August 10, 2011

Ms. Meredith Streeter, P.E.

NEW YORK STATE DEPARTMENT OF
ENVIRONMENTAL CONSERVATION
Bureau of Water Compliance, 4th Floor
625 Broadway
Albany, New York 12233-3506

RE: Representative Outfall Waiver
Ben Weitsman of Syracuse, LLC
SPDES ID NYR00D751
Town of Geddes, Onondaga County, New York

Dear Ms. Streeter:

In response to your July 6, 2011 letter and August 9, 2011 email to my consultant, we are submitting a Representative Outfall Waiver request for Outfall 002.

BACKGROUND INFORMATION

When BWS became the new site owner, this facility was in poor condition. There were numerous large scrap piles across nearly the entire site, including along the northern end up to the property boundary. The facility had installed a used metal shredder in 2008, which experienced numerous and frequent breakdowns. This shredder operated very infrequently in 2008 and 2009 and not at all in 2010. In addition, there were two fuel oil tanks resting on the soil, near the weigh scales. Over the years, the prior owner received numerous complaints from the Town of Geddes about excessive dirt and scrap on the public roadway leading to the site entrance. There was a "hump" at the site entrance and grading that directed stormwater toward the site interior.

Upon transfer of the property, BWS quickly implemented a number of site improvements. The south end of the site was re-graded to move the hump at the entrance and an expanded area was

607-687-7777

paved. This new pavement altered the stormwater flow direction toward the site entrance, which reduced water ponding on unpaved surfaces that previously had produced mud and was subsequently dragged out onto the public roadway by exiting vehicles. A sweeping schedule was implemented to control the dirt and debris on the newly expanded pavement. The used metal shredder was removed from the site. The sizes of scrap piles were significantly reduced and many were eliminated (the scrap was trucked off-site to be shredded). The removal of the shredder allowed the entire operation to move southward, away from the northern site perimeter and into view of the office building. As a result of this site restructuring, a significant portion of the drainage area contributing to Outfall 002 was no longer used for processing.

At the time of sampling in December 2010, Outfall 001 was the worst-case outfall. This outfall included drainage from the rail and car weigh scales, incoming scrap inspection area, fuel oil storage tanks, metal scrap piles, maintenance garage and storage of heavy machinery for loading/ unloading scrap. In contrast, the drainage area for Outfall 002 contained several scrap metal piles, however much of this drainage area was vacant and not used for scrap metal processing or storage.

Additional site upgrades were implemented in 2011, including the relocation of the two fuel oil storage tanks into concrete secondary containment and the reconstruction of two stormwater detention ponds in the northeast and northwest site corners.

This Representative Outfall Waiver request is based upon the factors described below:

- At the time of stormwater sampling in 2010, the activities conducted in and around both Outfalls 001 and 002 included scrap metal loading and unloading operations and heavy machinery to move the scrap. However, Outfall 001 was the worst-case outfall due to the fact that it also included runoff from the site entrance, incoming scrap inspection area, weigh scales (truck and rail), maintenance garage and fuel oil storage tanks.
- Pollution prevention procedures are implemented site-wide. All paved surfaces are frequently swept to remove excess dust, dirt and debris. Scrap storage at the site is minimal. It is company policy to move as much incoming scrap as possible off-site within 24 hours of arrival.

- Outfall 001 is located in the southeast site corner at the site entrance. Aggregated stormwater runoff from the south end of the site exits the property onto Bridge Street through the entrance and enters an MS4 in the roadway. Outfall 002 is located in the northwest site corner and consists of a riprap spillway.
- Estimate of the runoff coefficient of the outfalls is provided below.
 - Outfall 001 High (>65%)
 - Outfall 002 Medium (40 to 65 %)
 - Outfall 003 Medium (40 to 65 %)

Attached to this Representative Outfall Waiver request is the following supporting documentation:

- Outfall 002 Discharge Monitoring Report (DMR) form marked to indicate "Representative Outfall Claimed at 001."
- A revised Notice of Intent/Termination (NOIT) form to reflect the current site condition as a result of recent site reconstruction.

Please contact me if you have any questions regarding this request.

Sincerely,



Adam Weitsman
President

AW/cs
Attachments